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Attorneys for the United States

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA,	)	NO. CR-19-00489 JST
	)	
Plaintiff,	)	STIPULATION AND <del>[PROPOSED]</del> ORDER
	)	SETTING CHANGE OF PLEA HEARING VIA
v.	)	ZOOM WEBINAR FOR OCTOBER 1, 2021.
	)	
OLEG TINKOV	)	
A/K/A/ OLEG TINKOFF,	)	
	)	
Defendant.	)	

Defendant Oleg Tinkov, by and through his retained counsel, the United States Attorney's Office for the Northern District of California, by and through Assistant United States Attorney Michelle J. Kane, and the United States Department of Justice, Tax Division, by and through Assistant Chief Yael T. Epstein, hereby stipulate and agree to the following:

1. A grand jury sitting in the Northern District of California returned an indictment on September 26, 2019, charging the defendant with two counts of subscribing to a false tax return,

1 statement, or other document, in violation of 26 U.S.C. § 7206(1). The indictment was unsealed  
2 following defendant's arrest in London on these charges on February 26, 2020.

3 2. The defendant has not yet appeared in this case. The defendant is currently in the United  
4 Kingdom (UK) contesting extradition and has provided to the government and a court in the UK expert  
5 medical reports supporting his claim that he is undergoing a UK-based intensive treatment plan for acute  
6 myeloid leukemia and graft versus host disease, is immunocompromised, and will be unable to safely  
7 travel as a result.

8 3. The parties have reached an agreement to resolve this matter.

9 4. The parties therefore request that the matter be set for a change of plea via Zoom webinar  
10 before this Court on October 1, 2021, at 9:00 a.m. Counsel for the United States will submit the written  
11 plea agreement for the Court's review. Once the matter is set for change of plea, the parties will request  
12 that the matter be set before the Duty Magistrate for arraignment on the indictment prior to entry of the  
13 change of plea.

14 5. The defendant understands that, under the Constitution, the United States Code, the  
15 Federal Rules of Criminal Procedure (including Rules 11, 32, and 43), he may have the right to be  
16 physically present at these hearings. He understands that right and, after consulting with counsel,

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voluntarily agrees to waive it and to proceed with remote proceedings, and in particular, video-teleconference (“VTC”) or telephone, if VTC is not reasonably available, from the United Kingdom.

IT IS SO STIPULATED.

STEPHANIE M. HINDS  
Acting United States Attorney

Dated:

MICHELLE J. KANE  
Assistant United States Attorney

Dated:

Yael T. Epstein  
Assistant Chief  
U.S. Department of Justice, Tax Division

Dated:

OLEG TINKOV  
Defendant

Dated:

JEREMY H. TEMKIN, Esq.  
Pro Hac Vice Motion Pending  
Attorney for Defendant

Dated:

CHRISTOPHER MORVILLO, Esq.  
Pro Hac Vice Motion Pending  
Attorney for Defendant

Dated:

ISMAIL RAMSEY, Esq.  
Attorney for Defendant

**ORDER**

Based on the stipulation of the parties and for good cause shown, the Court HEREBY ORDERS:

WHEREAS the proceeding cannot be conducted in person without seriously jeopardizing public health and safety; and

WHEREAS there are specific reasons, in this particular case, that the change of plea cannot be further delayed without serious harm to the interests of justice;

THEREFORE, the matter of *United States v. Oleg Tinkov*, No. 19-CR-00489, be set for a change of plea via Zoom webinar before this Court on October 1, 2021, at 9:30 a.m.

IT IS SO ORDERED.

DATED: September 20, 2021



HON. JON S. TIGAR  
United States District Judge